

Exhibit L

From: Erin Quist <erin@conardnelson.com>

Sent: Wednesday, June 7, 2023 4:07 PM

To: Jacobs, Benjamin K. <benjamin.jacobs@morganlewis.com>; Mackie, Eric L. <eric.mackie@morganlewis.com>; Cuttino, Jocelyn R. <jocelyn.cuttino@morganlewis.com>; jschmitt@nilanjohnson.com; dpishko@nilanjohnson.com; kschmidt@nilanjohnson.com; Burkhardt, Michael S. <michael.burkhardt@morganlewis.com>; Christinzio, Nicole <nicole.christinzio@morganlewis.com>; Dowling, Patricia A. <patricia.dowling@morganlewis.com>; PH Calendar Department <PHCalendarDepartment@morganlewis.com>

Subject: Plaintiff Deering Proposed Trial Exhibits and Updated Exhibit List

Importance: High

[EXTERNAL EMAIL]

Dear Counsel,

Please find below the link to access Plaintiff's Proposed Exhibits and updated Exhibit List.

If necessary, the password to access the file is: Deering1234!

If you have any trouble accessing the file, please contact our office immediately.

 [1 - Marked Exhibits and Exhibit List](#)

Kind Regards,

Erin D. Quist

Paralegal | 121 South 8th Street | Suite 1425 | Minneapolis, MN 55402

Phone: (612) 808-9827 | E-mail: erin@conardnelson.com

Website: www.conardnelson.com



The information contained in this transmission may contain privileged and confidential information. It is intended only for the use of the person(s) named above. If you are not the intended recipient, then you are hereby notified that any review, dissemination, distribution, or duplication of this communication is prohibited. If you are not the intended recipient, then please contact the sender above by reply email and destroy all copies of the original message, to include all attachments, if any.

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Daniel'la Deering,

Case No. 20-1534 (DSD/ECW)

Plaintiff,

v.

Lockheed Martin Corporation, et. al.,

PLAINTIFF'S EXHIBIT LIST

Defendants.

PRESIDING JUDGE: Honorable David S. Doty	PLAINTIFFS' ATTORNEYS: Kaarin Nelson Schaffer, William J. Egan, Heidi J.K. Fessler	DEFENDANT'S ATTORNEYS: Michael S. Burkhardt, Jocelyn R. Cuttino, Benjamin K. Jacobs, Donald M. Lewis, Joseph G. Schmitt
TRIAL DATE(S): June 26, 2023	COURT REPORTER:	COURTROOM DEPUTY:

PLF. NO	DATE OFFR.	MARKED	COMMENTS	BATES	DESCRIPTION
P-1				LMC000573- LMC000578	Lockheed Martin Proprietary Information
P-2				LMC000556- LMC000558	Lockheed Martin Protection of Sensitive Information
P-3				LMC000095- LMC000098	Lockheed Martin Nondiscrimination and Equal Employment Opportunity
P-4				LMC006007- LMC006049	Lockheed Martin Code of Ethics and Business Conduct
P-5				LMC006953- LMC006955	Lockheed Martin Employee Discipline Process

P-6				LMC000998-LMC001002	Lockheed Martin Employee Conduct and Disciplinary Action
P-7				LMC000684-LMC000716	RMS Discipline Review Committee Process, March 15, 2017
P-8				LMC005291	True and correct copy of correspondence between Wronsky, Bastian, Cash to be sent as ACP re: ERC Notification
P-9				LMC003634	True and correct copy of email correspondence between Maryanne Lavan, Ken Bastian, and Susan Dunnings on December 18, 2018
P-10				LMC004386-LMC004387	True and correct copy of email correspondence between Christian Midgley and Tracey Dow on January 3, 2019
P-11					Deposition of Kenneth Ray Bastian, December 21, 2021
P-12					Video Deposition of Kenneth Ray Bastian, December 21, 2021
P-13					Deposition of Billie Jo Schuermann, November 30, 2021
P-14					Video Deposition of Billie Jo Schuermann, November 30, 2021
P-15					Deposition of Sumari Stamps-Henderson, December 7, 2021
P-16					Video Deposition of Sumari Stamps-Henderson, December 7, 2021
P-17				DD00003564	True and correct copy of September 17, 2018 between Bill Egan email and Grace Speights
P-18				DD00003498	True and correct copy of correspondence on October 12, 2018 between Krissy Katzenstein email to Bill Egan
P-19				DD00003499-DD00003502	Document attached to correspondence on October 12, 2018 between Krissy Katzenstein email to Bill Egan
P-20				DD00003457	True and correct copy of correspondence on October 26, 2018 Bill Egan email to Grace Speights

P-21				DD00003458- DD00003462	Documents attached to October 26, 2018 correspondence between Bill Egan email to Grace Speights
P-22				DD00003463- DD00003464	True and correct copy of correspondence on October 27, 2018 Grace Speights email to Bill Egan
P-23				DD00003466- DD00003467	True and correct copy of correspondence on October 30, 2018 between Grace Speights and Bill Egan
P-24				DD00003468- DD00003469	True and correct copy of correspondence on October 30, 2018 between Grace Speights and Bill Egan
P-25				DD00003470	True and correct copy of correspondence on November 1, 2018 Grace Speights email to Bill Egan
P-26				LMC004396	Daniel'la Deering Termination Notice from Lockheed Martin
P-27					Deposition of Michelle Hill, November 30, 2021
P-28					Video Deposition of Michelle Hill, November 30, 2021
P-29					Deposition of Susan Dunnings, November 29, 2021
P-30					Video Deposition of Susan Dunnings, November 29, 2021
P-31					Deposition of Maryanne Lavan Deposition, November 22, 2021
P-32					Video Deposition of Maryanne Lavan Deposition, November 22, 2021
P-33					Lockheed Martin Annual Report 2022
P-34				LMC004390- LMC004391	DRC adjudication
P-35				DD00000001- DD00000002	Daniel'la Deering 2017 W-2
P-36				DD00000004- DD00000005	Daniel'la Deering 2018 W-2
P-37					REMOVED
P-38				DD00000017	Daniel'la Deering 2019 1099
P-39				DD00000221	Daniel'la Deering 2017 Taxes
P-40				DD00000234- DD00000255	Daniel'la Deering 2017 Taxes (Federal and MN State)

P-41				DD00000257	Daniel'la Deering 2018 Taxes
P-42				DD00000266- DD00000290	Daniel'la Deering 2018 Taxes (Federal and MN State)
P-43				DD00000639	Daniel'la Deering 2019 Taxes
P-44				DD00000647- DD00000677	Daniel'la Deering 2019 Taxes (Federal and MN State)
P-45				DD00001412- DD00001413	Daniel'la Deering 2020 Taxes
P-46				DD00003555- DD00003558	Anaplan offer of employment
P-47				DD00003565- DD00003607	Daniel'la Deering 2021 Federal and MN State Taxes
P-48				DD00003608- DD00003610	Summary of Job Search Efforts by Daniel'la Deering
P-49				DD00003611- DD00003693	Supporting Documents for Plaintiff Exhibit P-48
P-50				DD00003694- DD00003698	Current Employment Compensation Documentation
P-51					
P-52					
P-53					
P-54					
P-55					
P-56					
P-57					
P-58					
P-59					
P-60					
P-61					
P-62					
P-63					
P-64					
P-65					

Plaintiff reserves the right to offer additional exhibits as may be necessary for rebuttal or impeachment, as may be discovered prior to trial, or to deal with developments

occurring after this list is submitted. Plaintiff also reserves the right to use illustrative exhibits prepared at or before trial, as may be useful in understanding any witness's testimony. Plaintiff further reserves the right to use any pleading or deposition at trial as may be allowed by the Rules of Evidence or the Rules of Civil Procedure.

Respectfully submitted by:

AVISEN LEGAL, P.A.

Dated June 5, 2023

By: /s/ William J. Egan
William J. Egan (#0166029)
901 Marquette Ave., Suite 1675
Minneapolis, MN 55402
(612) 584-3400 Main
(612) 455-3974 Direct (612) 437-4830
Fax began@avisenlegal.com

INNOVA LAW GROUP, PLLC

By: /s/ Heidi J.K. Fessler
15624 Europa Avenue North
Hugo, MN 55038
Minneapolis, MN 55402
(651) 407-7151 Main
(651) 278-3895 Direct

**CONARD NELSON SCHAFFER
PLLC**

By: /s/ Kaarin Nelson Schaffer
Kaarin Nelson Schaffer (#0386919)
121 S. 8th St., Suite 1425
Minneapolis, MN 55402
kaarin@conardnelson.com
(612) 808-9827 Main

ATTORNEYS FOR PLAINTIFF

